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February 13, 2024

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York, 10007

Re: **United States v. Juan Orlando Hernandez Alvarado, 15 Cr. 379 (PKC)**
(Supplemental CIPA section 5 Notice)

Dear Judge Castel:

The Court has scheduled a hearing pursuant to section 6 / 6a of the Classified Information Procedures Act. The hearing is to commence at 10:00 a.m. on February 14, 2024.

Mr. Juan Orlando Hernandez writes pursuant to CIPA section 5 and gives notice as follows:

as to the 5-single spaced page document generated by non-cleared counsel on February 5, 2024, which has now been through classification review (as of February 11, 2024), Mr. Hernandez seeks to use at trial the information reflected in paragraphs 2, 3, 6, 12, 13, 15, 16, and the last two lines of paragraph 35.

As the information in the above noted paragraphs has been deemed classified, and the government has taken a rather confusing position as to this information, further argument on these matters will be presented during the hearing tomorrow.

I thank the Court for its time and consideration of these matters.

Respectfully submitted,

/s/ Sabrina Shroff

Counsel to Juan Orlando Hernandez

cc: CISO Hartenstine & Mullery (via email)